

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

A.E.S.E., a minor child, and EUSEBIO DANIEL SABILLON PAZ, her father,

Plaintiffs,

V.

UNITED STATES OF AMERICA and  
MANAGEMENT & TRAINING  
CORPORATION,

Defendants.

Case No. 2:21-cv-00569-RB/GBW

**STIPULATED MOTION FOR EXTENTION OF TIME TO FILE MOTION TO  
COMPEL**

Plaintiffs respectfully submit this Stipulated Motion for Extension of Time to File Motion to Compel and state as follows:

1. On March 24, 2023, Plaintiffs served their First Set of Interrogatories, First Set of Requests for Production of Documents, and Request For Entry onto Land to Defendant Management & Training Corporation (the “Discovery Requests”).

2. Defendant Management & Training Corporation (“MTC”) requested, and Plaintiffs granted, an extension to May 12, 2023 to serve its responses to the Discovery Requests.

3. On May 12, 2023, MTC served its Objections, Answers, and Responses to Plaintiffs' Discovery Requests, along with a production.

4. Pursuant to Federal Rule of Civil Procedure 37 and District of New Mexico Local Rule 26.6, Plaintiffs have 21 days from receiving MTC's objections, answers, and responses to

the Discovery Requests to file a motion to compel.

5. Given that the parties are currently engaged in good faith discussions around the scope and content of MTC's responses, objections, and answers to the Discovery Requests, Plaintiffs anticipate requiring more than 21 days to file a motion to compel discovery, should one be required.

6. Plaintiffs and MTC have stipulated to this motion, and MTC does not oppose granting an extension of a motion to compel beyond the 21 days, should one be required.

For these reasons, Plaintiffs respectfully move the Court to extend the time to file a Motion to Compel until June 23, 2023.

Respectfully submitted,

May 26, 2023

**By: /s/ Marcela Johnson**

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*Approved by*

**By: Approved via email on May 26, 2023**

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*\* Appearing pursuant to D.N.M.LR-Civ.  
83.3(a).*

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**CERTIFICATE OF SERVICE**

I certify that on May 26, 2023, I filed the foregoing document electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means.

By: /s/ Marcela Johnson  
Marcela Johnson